

Appendix G

Response to Comments

Lance Oil & Gas Thunderhead CBM Project
Responses to Comments on the EA
August 30, 2004

(Note: The issues below are characterized by verbatim transcriptions and close paraphrasing of comments received. Letters and comments are referenced in each issue below to show the sources of the issue characterization. Their listing is not meant to imply that they are the only comments received that pertain to that issue.)

Comments were received from the following individuals and organizations:

- Wendell Funk, Palmyra, Illinois – See responses below.
- Wyoming Game & Fish Department – This letter referred to another project and therefore is not considered “substantive” under 36 CFR 215 because it is not specific to the proposed project. These comments could not be responded to because they referred to a different project.
- Wyoming Department of Environmental Quality – See responses below.
- Wyoming Office of State Lands and Investments – No concerns were expressed.
- U.S. Environmental Protection Agency - This comment letter was received after the comment period closed. Thus the commentor does not have standing for administrative appeal under 36 CFR 215. Comments were responded to because they were specific to this proposed action.

Purpose and Need for the Project

Commentor contends that this project will cause unnecessary environmental degradation while not solving deeper, long term problems associated with excessive energy consumption. (Letter 1, Comment 1)

Response: Long term problems regarding excessive energy consumption are outside the scope of this analysis. The EA describes the environmental effects of the proposed project. The project was designed to meet all the environmental protections required by the Thunder Basin National Grasslands Management Plan. This comment is not considered “substantive” under 36 CFR 215 because it is outside the scope of the proposed project, is not specific as to the proposed action, and does not provide supporting reasons for the Responsible official to consider as to why the environmental effects would cause unnecessary environmental degradation.

Consultation with Native Americans

Commentor suggests that consultation with Native Americans on this project does little to ameliorate the consequences of the Ft. Laramie Treaty that was subsequently broken. (Letter 1, Comment 2)

Response: Amelioration of broken treaties is outside the scope of this analysis. This comment is not considered “substantive” under 36 CRF 215 because it is outside the scope of the proposed project.

Economics

Commentor contends that the proposed project will only provide a short term economic benefit to the local economy that is of little value because it may only last for 50 years. (Letter 1, Comment 3)

Response: The EA (pgs. 3-118 to 3-126) discusses the economic benefits expected from the project and the expected duration of those effects. This comment is not considered “substantive” under 36 CRF 215 because it does not provide supporting reasons for the Responsible Official to consider as to why an economic benefit of 50 years is of little value to the local economy.

Compliance with regulatory permitting processes regarding water quality

Commentor requests that all permitting processes regarding water quality be followed before, during, and after project construction. (Letter 3, Comment 1)

Response: Permitting requirements to maintain water quality for this project are discussed in the EA (pg. 2-27). All such procedures will be followed. This comment is not considered “substantive” under 36 CRF 215 because this comment is not specific to the proposed project and does not include supporting rationale for the Responsible Official to consider.

Air Quality

Commentor requests that the EA include additional information in the air quality analysis to address the impacts of emissions from the drill rigs during construction. (Letter 5, Comment 1)

Response: The EA was modified to include this information. The additional information did not change the conclusions in the EA.

Water Quality

Commentor requests that the EA use a different value for conveyance loss of produced water to be consistent with the PRB EIS. (Letter 5, Comment 2)

Response: The value used in the PRB EIS was a best estimate based on computer modeling. The figure for conveyance loss used in the EA is based on actual observations in the Project Area and is still considered conservative as explained in

the EA. The use of another value will not more accurately display the likely on-the-ground effects of the Project. Therefore the EA was not modified.